REMARKS

Applicant has carefully reviewed the Office Action mailed October 28, 2005, and respectfully requests reconsideration of the subject application, particularly in view of the above amendments and the following remarks.

Status of the Claims

Claims 1–22 were previously pending. Claims 5–9, 12, and 14–22 have been cancelled herein. Claim 23 has been added herein. Accordingly, claims 1–4, 10, 11, 13, and 23 are pending.

Rejection Under 35 U.S.C. § 112, Second Paragraph

Claims 1, 6, 14, and 17 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicant has amended claim 1 in a manner that Applicant believes renders the rejection moot. Claims 6, 14, and 17 have been cancelled. Thus, Applicant respectfully requests that the rejection be withdrawn.

Rejection Under 35 U.S.C. § 103(a) – Rao and Bruck

Claims 1–20 and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,535,511 B1 to Rao (hereinafter "Rao") in view of U.S. Patent No. 6,801,949 B1 to Bruck et al. (hereinafter "Bruck"). Applicant respectfully traverses. When determining whether a claim is obvious, an Examiner must make "a searching comparison of the claimed invention—*including all its limitations*—with the teaching of the prior art." *In re Ochiai*, 71 F.3d 1565, 1572 (Fed. Cir. 1995) (emphasis added). Thus, "obviousness requires a suggestion of all limitations in a claim." *CFMT, Inc. v. Yieldup Intern. Corp.*, 349 F.3d 1333, 1342 (Fed. Cir. 2003) (citing *In re Royka*, 490 F.2d 981, 985 (CCPA 1974)). Moreover, as the Supreme Court recently stated, "*there must be some articulated reasoning* with some rational underpinning to support the legal conclusion of obviousness." *KSR Int'l Co. v. Teleflex, Inc.*, 550 U.S. 398, 418, 82 U.S.P.Q.2d (BNA) 1385, 1396 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006) (emphasis added)).

Applicant's claims, as amended, relate to a packet modifier device that receives a mapping for use in mapping packets in a stream of data from an end system to a remote system. The mapping is received from one of two network application servers, one of which provides a mapping for voice streams from a first pool of addresses, and the other of which provides a mapping for data streams from a second pool of addresses. Thus, the packet modifier device receives a mapping from different network application servers for different modes of communication. Neither the first network application server nor the second network application server is in the path of the packets. Conventionally, and as illustrated, for example, by Rao, as discussed below, a network address translator typically handles both the network address translation and the address mappings used for translations. Separating such functionality in the manner recited in Applicant's claims becomes increasingly relevant when the network may handle multiple different types of streams, such as voice call and data streams. In such situations, maintaining the number of such streams can become processor intensive, and may negatively impact address translation. Thus, among other features, Applicant's recited embodiments reduce processing requirements of a network address translator.

Although the independent claims have been amended herein, Applicant will briefly discuss the prior art references with respect to claims 1, 10 and new claim 23. Rao discloses a router that includes a translation engine and a translation table (Rao, column 4, lines 36–51). Rao fails to disclose that the translation engine receives address mappings from different network application servers depending on the type of mode in which a device is communicating, and that the translation engine is in a device that is separate from the devices from which the address mappings are received. Rather, in contrast, Rao discloses to use a single device—a router—to both maintain a translation table and a translation engine (Rao, *Id.*)

Bruck discloses a server system that functions as a front server layer between a network, such as the Internet, and a back-end server layer having multiple machines (Bruck, Abstract). Bruck discloses the use of "virtual IP pools" which appear to aid in distributing requests among multiple servers in a server cluster in a way that is transparent to the requestor. In particular Bruck discloses:

> Because of the distributed server cluster software installed at each machine 302, 304, 306, 308, users or host machines on both sides of the server cluster 310 will know of and will direct data packets to an address in one of the virtual IP pools, rather than the primary IP address associated

> with each server cluster machine. Thus, a router 320 that directs data traffic to the computers behind the server cluster 310 will be aware of only the IP addresses in the virtual IP pool 322 on the external subnet and will not be aware of the primary IP addresses assigned to the NIC cards of each respective server cluster machine 302, 304, 306, 308. Similarly, the internal host machines 330, 332, 334 behind the server cluster 310 will be aware of only the IP addresses in the virtual IP pools 324, 326 on the respective internal subnets 316, 318 and will not be aware of the primary IP addresses assigned to the NIC cards in the server cluster machines for each connection to an internal subnet. (Bruck, column 8, lines 17 – 33).

Nowhere does Bruck disclose the maintenance of address pools for the purpose of mapping addresses of packets from an end system to a remote system, as recited in Applicant's claims. Nor does Bruck disclose that a translation engine receives address mappings from different network application servers depending on the type of mode in which a device is communicating, and that the translation engine is in a device that is separate from the devices from which the address mappings are received.

For at least the foregoing reasons, Applicant submits that claims 1, 10, and 23 are allowable over the cited references. Claims 2–4 depend directly or indirectly from claim 1 and should therefore be allowable as depending from an allowable independent claim. Claims 11 and 13 depend from claim 10 and should therefore be allowable as depending from an allowable independent claim.

Rejection Under 35 U.S.C. § 103(a) – Rao, Bruck, and Durham

Claim 21 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Rao in view of Bruck and "The COPS (Common Open Policy Service) Protocol," The Internet Society, January 2001, by Durham et al. Claim 21 has been cancelled. Thus, Applicant respectfully requests that the rejection be withdrawn.

Conclusion

The present application is now in condition for allowance and such action is respectfully requested. The Examiner is encouraged to contact Applicant's representative regarding any remaining issues in an effort to expedite allowance and issuance of the present application.

Respectfully submitted,

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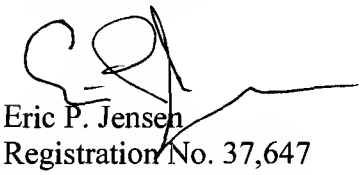
By: 

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